

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMIE ABREU and CHRISTIANA GARRISON,

Plaintiffs,

RULE 26(f) REPORT

-against-

08 Civ. 535 (WHP)

**JOHN B. MATTINGLY, as Commissioner of the
Administration for Children's Services of the
City of New York, and ADMINISTRATION FOR
CHILDREN'S SERVICES OF THE CITY OF
NEW YORK,**

Defendants.

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Pursuant to Federal Rules of Civil Procedure ("FRCP") Rule 26(f), the parties submit this report of a proposed discovery plan.

1. Discovery

The parties discussed and reached agreement, subject to Court approval, on the following schedule for beginning discovery:

- a) Initial or Automatic Disclosures will be made by July 24, 2008. Where possible, the parties will endeavor to provide copies of documents, not just descriptions of documents.
- b) Requests for Production of Documents and Interrogatories: will be served by September 15, 2008.
- c) Plaintiffs intend to take depositions of employees of Defendant Administration for Children's Services familiar with the facts on or before December 15, 2008.

d) Defendants intend to take depositions of Plaintiffs and witnesses familiar with the facts on or before December 15, 2008.

e.) Discovery should be completed by January 15, 2009.

2. **Motions**

a) The parties are likely to move for summary judgment after the conclusion of discovery.

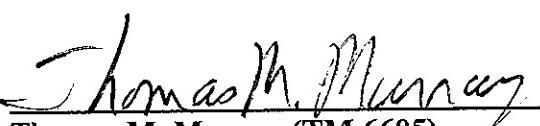
b) At the conclusion of discovery, counsel will confer about any anticipated motions and will notify the Court of any forthcoming motions within two weeks of the conclusion of discovery. The parties will also submit a motion schedule at that time, if any motions are forthcoming.

3. **Settlement**

Finally, possibilities for settlement were discussed by the counsel for the parties.

Dated: New York, New York

July 3, 2008


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So Ordered:

William H. Pauley, III, U.S.D.J.